

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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NEFTALI VERGARA CRUZ  
WANDA I. RODRIGUEZ ALEMAN

\* CASE NO. 10-12013-MCF

\*

Debtor(s)

CHAPTER 13

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BANCO SANTANDER PR

\* INDEX

Movant

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NEFTALI VERGARA CRUZ  
WANDA I. RODRIGUEZ ALEMAN  
and ALEJANDRO OLIVERAS RIVERA  
as DEBTOR and TRUSTEE

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Respondent (s)

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**DEBTORS' RESPONSE TO MOTION FOR RELIEF OF STAY**

TO THE HONORABLE COURT:

**NOW COME, NEFTALI VERGARA CRUZ and WANDA I. RODRIGUEZ ALEMAN,**  
debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. Banco Santander PR ("Santander") filed a motion for relief from stay basically alleging that the debtors are in post-petition mortgage loan arrears in the sum of \$7,639.40, including late charges and legal fees.

2. The debtors hereby respectfully submit that they admit owing post-petition arrears in the residential mortgage loan owed to Santander and that they wish to deal with this matter outside the Bankruptcy Court. Therefore, the debtors hereby consent to movant's request that the Court order the lifting of the stay, in the above captioned case.

**WHEREFORE**, the debtors respectfully request from this Honorable Court to grant the present response as to the motion for relief from stay filed by Santander, docket no. 33, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Ramos & Bague, Counsel for Santander; I also certify that a copy of this motion was sent via regular mail to the debtors/respondents Neftali Vergara Cruz and Wanda I. Rodriguez Aleman HC 01 Box 8537 Gurabo PR 00778.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 18<sup>th</sup> day of October, 2011.

/s/ Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
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